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November 14, 2012

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RE: Notice of Oral *Ex Parte* Communication  
Docket 09-182

Dear Ms. Dortch:

This notice is submitted in fulfillment of Section 1.1206(b) of the Commission's Rules.

On November 9, 2012, I had a telephone conversation with Dave Grimaldi, Chief of Staff and Media Legal Advisor to Commissioner Clyburn.

In the conversation, I described how relaxation of the newspaper/broadcast cross-ownership rules would undermine efforts to promote minority, female and small-business ownership and, thereby, undermine diversity in the marketplace of ideas as well. I explained that the smaller properties which are the ones most likely to be involved in new cross-ownerships are owned by smaller entities. Moreover, such stations are the ones most likely to be acquired by minorities, women and new entrants.

With respect to the Commission's forthcoming release of ownership data, I noted that the timing indicates that the Commission is unlikely to have taken this data into account in its decision on the NPRM, and it will not have the benefit of public comment on the data. The failure to seek comment under similar circumstances resulted in a reversal of the Commission's earlier ownership decision, I said.

I also argued for aggressive restrictions on so-called shared service agreements.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew Jay Schwartzman". The signature is fluid and cursive, with the first name "Andrew" being the most prominent.

Andrew Jay Schwartzman

cc. Dave Grimaldi